

From: [Mishkin, Katherine](#)
To: [Ofrane, Rebecca](#)
Subject: RE: Round 1 sample analyses - Cabo ROjo
Date: Monday, December 23, 2013 8:01:01 AM

Hey Becky,

Given the number of potential sources out there, I think sampling for 1,4-dioxane would be a good idea. We don't really know what is out there and we don't want to have to go back and do it later.

From: Ofrane, Rebecca
Sent: Thursday, December 19, 2013 4:30 PM
To: Mishkin, Katherine
Subject: FW: Round 1 sample analyses - Cabo ROjo
Hey Katie –

They're getting ready to do GW sampling at Cabo, and wondering if they should include 1,4-dioxane. I'm trying to determine if there's any specific reason to exclude or include it. I'm leaning towards including it at least for this first round, and maybe just a random sampling of wells. Julie said that's what they're doing at San German (also your site?), by sampling ~1/3 of the wells for 1,4-dioxane. Just wanted to see if you had any thoughts before responding.

Thanks!

Becky Ofrane
(212) 637 4302

From: Zeno, Denise
Sent: Thursday, December 19, 2013 3:10 PM
To: Ofrane, Rebecca
Cc: Hauptman, Mel; Susan Schofield
Subject: FW: Round 1 sample analyses - Cabo ROjo
Can you please read Susan's email and give me your opinion?
thanks
Denise

From: Schofield, Susan <SchofieldSE@cdmsmith.com>
Sent: Thursday, December 19, 2013 12:31 PM
To: Zeno, Denise
Subject: Round 1 sample analyses - Cabo ROjo

Buenas tardes Denise,

I will be submitting the CLP/DESA laboratory request for Cabo Rojo within the next few days, with the plan to start sampling on or about January 27, 2014. According to our work plan approved by EPA, the samples will only be analyzed for Target Compound List volatiles and water quality/monitored natural attenuation parameters.

Based on experience with recent sampling for the San Germán project in Puerto Rico, the EPA risk assessors were very concerned that we do not have laboratory analyses for the compound 1,4-dioxane. When this compound is analyzed with the TCL VOC list, the results are automatically rejected during data validation and, in fact, DESA does not even report results for 1,4-dioxane because they know the results will be rejected.

1,4-dioxane can be analyzed with the SVOC list, but the compound must be specifically requested to be part of the SVOC list. The results from this analysis are more likely to be considered valid and can be used for site evaluation purposes.

Now, my question – do you want to check with your risk assessors for the project to determine if they consider results for 1,4-dioxane to be critical for the Cabo Rojo project? Since we are only scoped to analyze for VOCs, we will not have any usable results for this compound. If this compound is viewed as critical, then we will have to request analysis for that one compound as an SVOC (this is what we are doing for the next round of groundwater sampling at San Germán). If 1,4-dioxane results are viewed by the risk assessors as critical, then I would anticipate that budget impacts will be minimal since we did not install as many wells as was assumed in the work plan. Thanks – I thought it best to highlight this potential problem early, before sampling, rather than have it come up after the field work is completed.

Susan

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